



## Transcript of **Crystal Repass**

Wednesday, September 8, 2021

*David Graham Goodman v. Kenneth W. Stolle, et al.*

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Reference Number: 107450

1 almost to the floor in which he was going to be  
2 assigned. I would say over halfway.

3 Q. So you said you used a pressure point  
4 behind his right ear; is that right?

5 A. Yes.

6 Q. Is that something that you are trained to  
7 do?

8 A. Yes.

9 Q. What situations are you trained to use  
10 that in?

11 A. Well, they're used as a defensive tactic  
12 technique. Instead of just strikes and kicks and  
13 stuff, we're also taught pressure points to try to  
14 apply a little bit of pain compliance, minimal force  
15 to control an inmate.

16 Q. And what were Diggs and Moissett doing  
17 while you were applying the pressure point?

18 A. We were trying to get -- they were trying  
19 to get his hands behind his back so we could handcuff  
20 him.

21 Q. And why were you trying to handcuff him?

22 A. Because now we're probably going to have

1 A. Yes.

2 Q. Do you know what DVR311 cameras 11 and 13  
3 are?

4 A. I don't want to speculate, but it would  
5 have been part of the incident.

6 Q. Did you review the footage from those  
7 cameras?

8 A. Yes. According to this, yes. I don't  
9 remember if I did or not, but according to my report,  
10 I did.

11 Q. So do you remember what the footage  
12 showed?

13 A. Well, the footage would have showed the  
14 incident, but I don't remember reviewing it. It was  
15 so long ago.

16 Q. So do you know what parts of the  
17 correctional center the cameras captured?

18 A. Most all of it's videoed. So it would  
19 have captured most of it. But I don't know what  
20 these DVR cameras are.

21 Q. But so there would be cameras, say, in the  
22 intake area, where you first encountered him, right?

1 A. There are.

2 Q. And are there cameras in the hallway that  
3 you took Mr. Goodman down?

4 A. Yes.

5 Q. And are there cameras in the B building  
6 first floor area, where you took him?

7 A. Yes.

8 Q. Are there cameras that would capture the  
9 cell that you put him in?

10 A. I don't know. Sometimes there are,  
11 sometimes they're not. That specific cell, I don't  
12 remember.

13 Q. And do you know if anyone else reviewed  
14 the video footage?

15 A. It says all parties, so I would -- I would  
16 assume they did.

17 Q. But you don't remember?

18 A. I did not see them. I don't remember, no.

19 Q. Did you write this part of the report,  
20 where it says, "action taken," and then it describes  
21 the cameras and other things?

22 A. Yes.

1 A. I mean, I spoke to her about everything.

2 I don't remember specifics. Like I said, I've never  
3 been sued before, so I mean, I talked to her about  
4 it, yes.

5 Q. If you look down at the next interrogatory  
6 and response, your answer starts, "my only discussion  
7 concerning the videotape of the incident was with  
8 Linda Richie." Do you remember having that  
9 discussion with her?

10 A. Yes.

11 Q. When did that discussion happen?

12 A. I just remember it happened. I can't tell  
13 you a date.

14 Q. Do you remember if it was in the last  
15 year, or was it longer ago than that?

16 A. You know, it was probably within the last  
17 year or so.

18 Q. And what do you remember about that  
19 conversation with Captain Richie?

20 A. Well, because I saw in Goodman's lawsuit  
21 that he wants the videotapes. And obviously, you  
22 know, I inquired about them, because that would be

1 very helpful. But they were not saved, because we  
2 were never -- I mean, it was investigated, and it was  
3 deemed unfounded. So if it's unfounded, they don't  
4 save the documents -- the tapes. That was my  
5 conversation with her.

6 Q. Do you know who makes that decision that  
7 it's unfounded?

8 MR. ROSEN: Objection, lack of foundation.  
9 You can answer.

10 THE WITNESS: Our internal affairs. I  
11 don't know specifically who.

12 BY MS. ANDREWS:

13 Q. So you approached Captain Richie about the  
14 videotape; is that right?

15 A. Yeah, I approached her about the entire  
16 lawsuit.

17 Q. But you asked her specifically about the  
18 videotape in a conversation with her, right?

19 MR. ROSEN: Object to the form of the  
20 question, asked and answered. Go ahead. You can  
21 answer again.

22 THE WITNESS: Yes.